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Attorneys for Defendant Vigorous Shipping & Trading, S.A.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

PACIFIC GULF SHIPPING CO.,

Plaintiff,

v.

ADAMASTOS SHIPPING & TRADING
S.A., VIGOROUS SHIPPING & TRADING,
S.A., BLUE WALL SHIPPING LTD., and
PHOENIX SHIPPING & TRADING S.A.,

Defendants.

No. 3:18-cv-02076-MO

DEFENDANT VIGOROUS SHIPPING &
TRADING, S.A.'S SECOND
SUPPLEMENTAL RESPONSE TO
PLAINTIFF'S EMERGENCY MOTION TO
EXTEND DEADLINES TO COMPLETE
DEPOSITIONS

Subject to its restricted appearance, Vigorous Shipping & Trading, S.A. is submitting this Second Supplemental Response to its filing at ECF No. 51 and Plaintiff's filing at ECF No. 52 on the issue of deponent availability. Vigorous Shipping's counsel Keith Letourneau was advised this afternoon via teleconference that Plaintiff's counsel was not available to take the depositions of the two witnesses this Saturday, Dec. 22, 2018. Plaintiff's counsel inquired as to the availability of witnesses on Thursday (Dec. 20, 2018) and Friday (Dec. 21, 2018). Vigorous Shipping's counsel then confirmed the deponent's availability to Plaintiff's counsel on those dates. Under the circumstances, Vigorous Shipping is proceeding to produce the two witnesses this Thursday and Friday in accordance with the Court's order. Vigorous Shipping's counsel Keith Letourneau left our offices this afternoon and is presently en route to Greece for the depositions on this Thursday and Friday.

DATED: December 18, 2018.

MILLER NASH GRAHAM & DUNN LLP

s/ Sanja Muranovic

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